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10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,  
14 Plaintiff,  
15 v.  
16 ROBERT RUNDO et al.,  
17 Defendants.  
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No. CR 18-759-CJC

EX PARTE APPLICATION TO CONTINUE  
DEADLINE; DECLARATION OF SOLOMON  
KIM

19 The government hereby applies, ex parte, for a continuance of  
20 the government's deadline to file any first superseding indictment  
21 in this case from January 3, 2023 to January 4, 2023.

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1 This ex parte application is based upon the attached declaration of  
2 Solomon Kim.

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4 Dated: December 30, 2022

Respectfully submitted,

5 E. MARTIN ESTRADA  
United States Attorney

6 ANNAMARTINE SALICK  
7 Assistant United States Attorney  
Chief, National Security Division

8  
9 /s/  
10 SOLOMON KIM  
MARIA JHAI  
Assistant United States Attorneys

11 Attorneys for Plaintiff  
12 UNITED STATES OF AMERICA  
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**DECLARATION OF SOLOMON KIM**

I, Solomon Kim, declare as follows:

1. I am an Assistant United States Attorney ("AUSA") in the United States Attorney's Office for the Central District of California. I am one of the AUSAs assigned to represent the government in United States v. Robert Rundo et al., CR 18-759-CJC.

2. On December 5, 2022, the Court ordered the government to file any first superseding indictment in this case on or before January 3, 2023. (Dkt. 205.)

3. On December 29, 2022, I was informed by my office's Grand Jury Clerk that the grand jury scheduled for January 3, 2023, the date on which the government's grand jury session for this case was scheduled, was cancelled. As a result, the government's grand jury session for this case was rescheduled to January 4, 2023.

4. Accordingly, the government requests that the Court grant a continuance of the deadline by which the government is required to file any first superseding indictment in this case from January 3, 2023 to January 4, 2024.

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